

THE COMMUNITY NEEDS ASSESSMENT PROCESS

Montana Department of Commerce

Anthony J. Preite, Director

**Dave Cole, Administrator
Community Development Division**

**Gus Byrom, CDBG Program Manager
Housing and Public Facilities**

**Program Specialists:
Kathryn Brenden
Frank Kromkowski
Jennifer Olson**

**Joanne Gilbert, Program Assistant
E-mail: jgilbert@mt.gov**

**301 South Park Avenue
Helena, MT 59620-0523**

Phone: (406) 841-2791

Fax: (406) 841-2771

Website: http://comdev.mt.gov/CDD_cdbg.asp

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"The future now depends on people all over the country working together to make things better in their particular place. It depends on people in different kinds of places - large and small towns, urban and rural neighborhoods - asking themselves what can we do to make this community a more hopeful place to be young, a more rewarding place to work, and a more friendly place to grow old."

*~ Alice Rivlin, former Director of the Congressional Budget Office
and Vice-Chair of the Federal Reserve Board*

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The forms included in the exhibits listed above can be ordered from the Department of Commerce in compact disc or 3.5 inch "floppy" computer disk format to simplify the process of designing local forms for income surveys or for completing CDBG application forms. The format used by MDOC is Microsoft Word for Windows.

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1. THE COMMUNITY NEEDS ASSESSMENT REQUIREMENT FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM

The basic framework of Montana's CDBG Program was established in 1982 by a 14-member Task Force composed of local government officials that was appointed by the Montana Department of Commerce (MDOC) to design the State's CDBG program. The Task Force recommended including a requirement that communities conduct a "needs assessment" process before applying for CDBG funding. The intent of Task Force members was to encourage Montana communities to move away from a "crisis management" approach to community problem-solving and instead adopt a view of community development as a long-term process of planned, incremental actions to improve the community over time. In addition, the Task Force members felt strongly that broad public involvement was critical for the process of setting community development objectives and to build public support to make a proposed project successful.

Subsequently, in 1984, Congress amended the Federal Housing and Community Development Act to require that each CDBG recipient "identify its community development and housing needs, including the needs of low and moderate-income persons, and the activities to be undertaken to meet such needs." According to the legislative history for the amendment, Congress established this requirement to promote better-coordinated strategies for addressing local needs, particularly as they affect low and moderate income persons. Apparently, Montana's CDBG Task Force and Congress independently developed similar requirements to address similar concerns.

The Montana CDBG Program requires that each local government applicant for a CDBG Public Facilities or Housing project must conduct a planning process that considers and describes:

- 1. The applicant's community development needs, including the needs of low and moderate income persons; and**
- 2. The activities it plans to meet the identified needs.**

It is the intent of Montana's CDBG Program that governments take full advantage of their local planning programs and not unnecessarily duplicate their local planning efforts solely for the purpose of meeting the CDBG "needs assessment" requirement. In many cases, a local government may have already identified "community development and housing needs" by preparing a community "growth policy." (Senate Bill 97, passed by the 1999 Montana Legislature, substituted the term "growth policy" for what was previously referred to as a "comprehensive plan" or "master plan" in state law.) Where a community has an existing, adopted growth policy, MDOC strongly encourages local officials to use it to meet the requirement that CDBG applicants "identify community development and housing needs" and possible activities to meet those needs.

Given the limited resources available to most communities, MDOC discourages stand-alone planning activities or community surveys that are intended for CDBG application purposes only, which are not being coordinated with the local government's on-going planning program.

There is no one recommended procedure that applicants should use in identifying community development needs and possible solutions for those needs. Some people think that a needs assessment means a community survey. A survey is one way to approach a community needs assessment, but there are other equally effective techniques. In the past, some local governments have assigned the task of identifying needs to an existing local planning board. Others have formed special short-term task forces

or citizen committees or utilized community-wide town meetings, neighborhood meetings, or interviews with community leaders. Whatever approach is followed, the applicant must, at a minimum, meet the CDBG citizen participation requirements described below.

Some communities have already conducted very similar planning or needs assessment processes that may be used to meet the federal CDBG requirement for identifying community development and housing needs and possible solutions for them:

- Several counties and multi-county areas have prepared a "Comprehensive Economic Development Strategy" (CEDS) with funding from the U.S. Economic Development Administration (EDA). The CEDS is a prerequisite for receiving financial assistance from several EDA programs.
- A number of communities have prepared "Resource Team Assessments" in conjunction with the Montana Department of Commerce or Montana Economic Developers Association.
- Some Montana communities have developed "Community Action Plans" with grants from the U.S. Forest Service.
- Other Montana communities have prepared "Needs Assessments," "Strategic Plans" or "Community Vision Plans," many with assistance from the community development staff from Montana State University's Cooperative Extension Service.

All of these alternatives can potentially be used to fulfill the needs assessment requirement.

The CDBG requirement to evaluate community needs and identify actions or activities to meet them can also provide an opportunity to review existing special purpose plans such as for capital improvements, economic development, housing, or urban renewal areas to determine if they still adequately reflect current conditions, needs, and community priorities.

The intent of the needs assessment requirement is to provide a community with a list of potential projects or actions that could be pursued over a period of years in order to improve the community. The needs assessment process does not have to be repeated if a previously prepared needs assessment or planning process still accurately reflects existing conditions and priorities. **If an existing needs assessment will be used as the basis for reapplication, the local government can simply solicit public comments on the previously identified community needs and priorities and the planned activities to meet the needs at one or more of the required public hearings to see if they still appear to be appropriate.**

A Special Note for Counties Regarding Community Needs Assessments

The county governing body is the appropriate, eligible applicant for CDBG projects intended to:

- **resolve problems within the unincorporated jurisdiction of a county;**
- **resolve problems that are truly countywide, regardless of jurisdiction;**
- **assist a non-profit entity (such as a Human Resource Development Council) which serves county residents; or**
- **resolve problems within the boundaries of county water and sewer districts.**

When a county government is the applicant, the CDBG needs assessment requirement applies to the entire county, not just the needs of a specific sub-recipient or unincorporated community being sponsored by the county.

Any CDBG application submitted by a county on behalf of a sub-recipient or unincorporated community, should describe the county's overall, countywide community development needs (including the unincorporated geographic area of the county), in addition to the particular needs of the entity which the county is applying on behalf of. The description should cover, at a minimum, all of the basic CDBG needs categories (economic development, housing, and public facilities).

For example, this requirement applies to counties applying on behalf of county water and sewer districts. Under Montana law, county water and sewer districts fall within the unincorporated jurisdiction of a county and the county government is considered the appropriate applicant under the Montana CDBG program. Since the county government is considered the “applicant”, the CDBG needs assessment requirement applies to the entire county, not just to the specific water and sewer district being sponsored by the

Whether or not your community ultimately decides to apply for CDBG funds, the process of periodically involving local citizens in identifying community priorities and needs and possible activities to meet them, is, in itself, valuable. It can provide local elected officials and other community leaders with important feedback from citizens on their major concerns regarding the community and provide a “road map” for future community projects. It can also be a useful way to review an existing community plan or growth policy to see if the previously identified goals, objectives, or other issues need to be updated.

COMMENT: A legitimate criticism of the “community needs assessment” concept, particularly in the context of CDBG program requirements, is that it tends to focus primarily on the negative aspects of the community’s situation: “What’s wrong with our community and what can we do about it?” According to the Heartland Center for Leadership Development, “too often, communities are encouraged to focus first on their deficiencies, such as needs, issues, or problems, rather than on their assets, those tangible and intangible resources that can be built upon to strengthen the community over time.”

Increasingly community development professionals are encouraging communities to also consider and inventory the positive aspects of their community:

Planning community initiatives from the perspective of “solving problems” or “meeting needs” casts a negative tone on what should be an exciting capacity building venture. The alternative is to identify the community’s assets and develop plans that build on them. All communities do have a substantial number of assets: the skills and entrepreneurial ideas of local residents, neighborhood businesses, churches, and other community institutions, sports and social clubs. Even things you do not control directly (hospitals, vacant land, schools, libraries) can become your assets if you plan and partner as needed to take advantage of them. Moreover, the act of jointly inventorying assets is itself a powerful community organizing device that, by evidencing opportunities to change things, motivates collaboration and commitment to action.

Community Building: Coming of Age **The Urban Institute**

In essence, communities should think about what makes their glass “half full” instead of “half empty.” While the CDBG requirements speak in terms of “needs,” this can also be an excellent opportunity to ask “what’s good about our community and how can we make it better?” Address the negatives, yes; but also identify the positive aspects of your

community and develop a strategy for building upon them to make the community an even better place to live.

A process that several communities have used for their needs assessments is to work through a series of questions in a public meeting:

1. Starting with the positive things about your community, ask, "What are the strengths and the positive things about living in _____?" As an alternative, you could ask "What do you like about living in _____?" This can be a good way to start the discussion and get people to open up and share their thoughts about the positive aspects of living in their community.
2. Second, you could pose the more "negative" question: "What are the problems or the negative things about living in _____?" Or ask the question, "What don't you like about living in _____?"
3. Third, ask about projects they would like to see or things they would like to see changed. For example, ask, "What projects would you like to see to improve _____?" or "What things would you like to see changed in _____?" Having the negative question as number two makes it easy to transition to "what projects would you like to see" or "what things would you like to see changed" as the next question, since the projects are so often designed to deal with the negative concerns. You can also ask, "What would make _____ a better place to live?" These may relate to either short-term projects or long-term changes.

The essence of the community needs assessment process is that people get together and make an honest, objective assessment of what the community has to offer and what the community's needs are. Once it has defined its strengths and weaknesses, a community can make a long-term plan to make the community a better place to live.

CDBG Planning Grants -- A Tool to Help Communities

The up-front costs of preparing local needs assessments sometimes can present an obstacle for communities, particularly for small towns with limited resources. The Montana CDBG program is able to play a unique role in assisting Montana communities because of its ability to offer planning grants to local governments. The grants can be used for a variety of planning activities including growth policies, or other planning efforts. Please contact the Department of Commerce for a copy of the current CDBG Planning Grant Guidelines, or refer to the CDBG website at:

http://comdev.mt.gov/CDD_cdbg.asp



2. CITIZEN PARTICIPATION REQUIREMENTS FOR THE CDBG PROGRAM

A closely related concern is whether the needs assessment process meets federal CDBG requirements for providing citizens, especially low and moderate-income residents, adequate notice and opportunity for meaningful involvement in the local planning process. The HUD regulations for the State CDBG Program (CFR 570.486, November 9, 1992) require CDBG applicants to "Provide for and encourage citizen participation, particularly by low and moderate income residents who reside in slum or blighted areas in which CDBG funds are proposed to be used."

The HUD regulations also require that CDBG applicants:

Provide for a minimum of two public hearings, each at a different stage of the program, for the purpose of obtaining citizens' views and responding to proposals

and questions. Together the hearings must cover community development and housing needs [and] development of proposed activities... The public hearings to cover community development and housing needs must be held before submission of an application to the state. There must be reasonable notice of the hearings and they must be held at times and locations convenient to potential or actual beneficiaries, with accommodations for the handicapped...

The HUD citizen participation regulations also require that CDBG applicants "Provide citizens with reasonable advanced notice of, and opportunity to comment on, proposed activities in an application to the state...." Based on the HUD regulations, the Montana Department of Commerce has adopted the following requirements to insure adequate citizen participation:

Unless reapplying for the **same project** submitted unsuccessfully in the previous year, the applicant must hold a minimum of **two** public hearings, one before preparing the application and one prior to passage of a resolution by the governing body authorizing the submission of the application. **Applicants should hold the first public hearing not more than eighteen months prior to the date of application. The second public hearing should be held not more than three months prior to the date of application.**

A record of the required hearings must be submitted with the application for CDBG funds, along with copies of the public notices for the hearings or affidavits of publication for the notices. A verbatim record is not necessary; applicants should provide a list of the names of persons who attended and a summary of comments by local officials and citizens which is sufficient to reflect the comments made by those attending the meeting.

Applicants reapplying for the same project submitted unsuccessfully in the previous year must still hold at least one public hearing prior to the passage of the resolution by the governing body authorizing the submission of the application. The applicant should hold the hearing not more than three months prior to the date of application.

If an unsuccessful CDBG applicant is re-applying for a CDBG project, or if a community has previously gone through a needs assessment process, it is not necessary for the community to repeat an exhaustive needs identification process "from scratch." If the community development and housing priorities and needs previously identified still appear to accurately reflect existing community conditions and priorities, the local government can simply solicit public comments on the previously identified community needs, and the planned activities to meet the needs, at the required public hearing to confirm that the previous needs assessment still appears valid.

Some local governments have asked how often a community should re-evaluate community needs. In general, once every five years has been used as a standard, but the timing can vary according to local circumstances, particularly, if major changes have occurred within the community. For example, state law requires that local government growth policies be reviewed every five years and revised, if necessary.

Public notice must be provided before public hearings are held. Notice of each public hearing should be published at least once in a newspaper of general circulation in the community at least seven days prior to the hearing. Where possible, notice should also be directed to persons of low and moderate income or those persons who will benefit from or be affected by CDBG activities and/or groups representing low and moderate income persons. **Hearings must be held at times and locations convenient to the general public and with reasonable accommodations for handicapped persons.** For hearings where a significant number of non-English speaking residents can be reasonably expected to participate, federal

law requires that arrangements be made to have an interpreter present.

In all cases, the local government must conduct the required public hearings, even if the local government is considering applying on behalf of a subrecipient, such as a local housing authority, human resource development council, or a county water and sewer district. Having the local government conduct the hearings, rather than delegating the task to a potential recipient of the CDBG funds, provides the most objective forum for considering alternative community needs (and potentially competing proposals for CDBG projects) and encourages a more frank discussion regarding any proposed community development projects.

SUGGESTION FOR APPLICANTS: Local officials and MDOC staff are well aware that formal public hearings are sometimes a very ineffective means of getting people involved or encouraging meaningful dialogue or discussion. The required CDBG "hearings" do not have to be formally structured or even be conducted in a hearing format to meet the CDBG public hearing requirement.

The CDBG Program encourages a neutral setting that promotes open discussion and an exchange of ideas regarding all community development and housing needs, priorities, and possible solutions. This can include an open town meeting or facilitated small group discussion with a final summation of identified community needs and solutions. Local officials may also want to use additional public involvement techniques such as open houses or presentations to local organizations to make more citizens aware of community needs and to solicit their ideas.

The First Public Hearing

The first public hearing is intended to give citizens an opportunity to identify and discuss their community's overall community development and housing needs and priorities, including the needs of low and moderate income persons, and to propose possible community improvement projects to meet those needs before the local government makes a decision on what project or projects it will seek CDBG assistance for. The federal Housing and Community Development Act requires that the public be provided with "information concerning the amount of funds available for proposed community development and housing activities and the range of activities that may be undertaken...." **The purpose of the first hearing is to provide an objective and neutral forum for considering overall community needs and potentially competing or alternative proposals for CDBG projects to deal with those needs, within the local government's jurisdiction.**

SUGGESTION FOR APPLICANTS: As a practical matter, MDOC CDBG staff understand that local officials may have a possible project in mind for a CDBG application before the first public hearing to "identify community development and housing needs" is held. However, it is very important that the location of the first hearing be considered a neutral site, not intended to skew the selection of the proposed project toward a pre-determined community need, so that all potential CDBG projects can receive fair consideration before a decision to submit a particular project is made. For example, even though a county government may be considering a project to serve a particular unincorporated community, the first public hearing should be held in the county seat, rather than in that unincorporated community, so that all potential community development and housing needs that people identify can receive fair and impartial consideration as a potential CDBG project.

The same concept would apply to a city considering a project in a particular neighborhood. Likewise, a local government may be considering an application on behalf of a non-profit organization, such as for improvements to a senior center. In this case, it would be inappropriate to hold the hearing for identifying community needs at the senior center since this may discourage advocates for other community needs from coming forward or speaking out. The site of the first public hearing should be a neutral one that

would encourage fair and impartial consideration of all potential CDBG projects.

In some cases, a local government may need to respond to a mandate from a state agency to improve a specific public facility. They may be under strong legal pressure to accomplish a particular project, such as upgrading the city wastewater treatment plant. The reason local officials rank this issue as their number one need is understandable. In this case, the citizen participation process can still be a valid way to educate local citizens regarding the community's obligation to assure adequate sewage treatment to protect Montana's environment. It can also involve real dialogue into HOW they accomplish goals. For example, which treatment alternative is most appropriate for the town's financial and technical capacity? Could they structure the financing in such a way as to minimize the financial impact on LMI families through the "targeting" of CDBG financial assistance to pay sewer assessments?

To minimize duplication, local governments may use advertised public hearings related to their planning program or other funding applications to meet the CDBG requirement for a public hearing prior to preparation of their CDBG application, as long as overall community needs and possible solutions are addressed. **An increasing number of Montana counties and cities are cooperating to publicize and hold joint, annual hearings to consider overall community development and housing needs for both the city and county.** By this means, a single public hearing can meet the requirements of several state or federal programs, such as the MDOC CDBG, HOME, or Treasure State Endowment Program (TSEP). This approach can also make participation more convenient for the public or interested organizations or groups.

The Second Public Hearing

The purpose of the second public hearing is to give citizens and potential beneficiaries of the proposed CDBG project (especially low and moderate income persons), or residents of the project area, adequate opportunity to consider the potential impacts and benefits of the community's proposed project and to comment on it, before the community submits the application. At this hearing, specific CDBG program requirements and related project issues should be reviewed. For example, if taxes or user charges will need to be increased as part of the cost of financing a CDBG project, it is especially important that residents be informed and understand the necessity of raising user costs.

To facilitate the participation of citizens who may be most affected by a proposed project, local officials may wish to hold the second public hearing in a location near the proposed project site, such as in an unincorporated community or a neighborhood in a larger city. Again, to minimize duplication, local governments may conduct a single public hearing to address the public hearing requirement for other funding programs while meeting the CDBG public hearing requirement. **The date of the second public hearing on the proposed CDBG project should be held far enough in advance of the application deadline so that local officials would have a reasonable amount of time to deal with any concerns or objections stated by citizens at the hearing.**

COMMENT: The CDBG Program is more concerned about substance, than form. It's not the number of hearings or meetings that have been held -- it's the quality of the dialogue that is taking place among and between citizens and the local officials.

Does the needs assessment and citizen participation process reflect one-way communication of a project that is a "done deal" where the basic concept has been decided in advance by a consultant or are local officials really soliciting public comment and listening to what is being said? Are they willing to modify the proposed project in response to public comments or concerns? Is the process "bottom-up" or "top-down?"

The citizen participation process should be viewed as more than simply compliance with a grant

application requirement. The public involvement process can be a key factor in developing community understanding and support for a proposed CDBG project and ultimately lead to a more successful project. By involving the public up-front in the development of grant proposals, local governments can build the foundation for long-term community support for its community development program. Whether or not your community ultimately decides to apply for CDBG funds, the process of involving local citizens in identifying community needs and possible activities to meet them, is in itself, valuable. It can provide your local elected officials and other community leaders with important feedback from citizens on their major concerns regarding the community, build consensus on common issues, and provide a “road map” for future community improvement projects.

Examples of Local Needs Assessment Processes

Alternative approaches for community “needs assessment” and citizen participation processes are explored in more detail in the *exhibits*. Most Montana communities have used a combination of these techniques for their community planning and needs assessment processes. Three examples are described below, taken from the Town of Darby, Lewis and Clark County, and the City of Roundup.



Darby

The community of Darby went through a similar process. A group of over 100 citizens formed the Darby Civic Group in the spring of 1992 to improve the quality of life for Darby area residents and to identify positive ways for the Town to prosper. Darby successfully applied for a U.S. Forest Service grant in 1992 to prepare a Community Action Plan (CAP). With the support of the Town Council, the Civic Group formed a subcommittee, the Community Action Team, to develop and implement the CAP. The Action Team considered the state of the community and identified both problems and opportunities. Input gathered from 200 area residents through a telephone survey, and approximately 70 town meeting participants was incorporated into the final CAP that was adopted in September 1993. The CAP, which includes goals and strategies to improve Darby, was adopted by the Town Council.

In 1998, the Darby Lumber Mill shut down, leaving nearly 100 people out of work. A new 20-member Community Action Team was formed to update the five-year-old CAP and address different areas of need. The Action Team conducted another community survey to update the 1994 CAP. Additionally, fifty people turned out for a town meeting to discuss the Plan’s priorities for the town. The purpose of the plan “is to boost the town in the eyes of potential donors and grant givers with a structured, cohesive plan that the majority of residents agree on.”

Darby’s prioritized list of projects fell into one of the following five categories: Education and Youth Services; Business, Industry and Tourism; Community and Health Services; Cultural, Quality of Life and Environment; and Infrastructure. Some of the Town’s priorities included creating a community investment foundation, improved transportation services for seniors, town landscaping, and developing a Darby Webpage. Specific people were assigned to accomplish specific projects and a timeline was set. Replacing the Darby Fire Station emerged as the top priority in the Infrastructure category. In 1999, in its second attempt, Darby successfully applied for CDBG funding for a new fire hall.



Lewis & Clark County

One example is the process used by Lewis and Clark County for developing its growth policy. The county

commissioners appointed a citizen advisory group (CAG) to prepare a new growth policy to replace their ten-year-old comprehensive plan and bring it into compliance with Senate Bill 97 passed in 1999. The advisory group members were selected to represent a cross-section of local interests including the chamber of commerce, the city-county planning board, fire districts, a homebuilders' organization, a pro-planning advocacy group, a property owners' group, a sportsman's association, realtors, as well as the unincorporated communities in the county. Each CAG member used a standard series of questions to interview several other knowledgeable persons to gather additional perspectives on issues of concern to citizens. The CAG also held an annual series of area meetings around the county over a two-year period to invite additional public comment as the growth policy was developed. At these meetings, CAG members were stationed at tables organized by issues and recorded citizen comments and concerns regarding the topic. At the end of the meeting, general public discussion and comments were invited. The resulting public comments were used to prepare a draft growth policy that was presented to the public through six hearings held across the county before it was adopted by the county commissioners.



In anticipation of possible coal mining activity, the community of Roundup began a public process in 1992 to discuss community needs. Participants included the City of Roundup, the school system, the county conservation district, and several county officials who met several times to discuss local infrastructure deficiencies. In 1994, a series of meetings were conducted with local agencies, financial institutions, realtors, etc. to assess community housing needs and options for dealing with them. Also, beginning in 1994, monthly noon luncheons were scheduled for the purpose of presenting information about three community topics or issues per month. Presentations were made by local organizations or officials and were well publicized by the local newspaper. These noon meetings, catered by a local church, became known as Topic Around Town (TAT), and had an average attendance of 30 or more citizens. The meetings were conducted consecutively for twelve months.

The TAT process evolved into a very effective community information tool and included local officials, senior citizens, representatives of community organizations, and other interested citizens. In addition, the Central Montana Resource Conservation and Development (RCAD) staff, in coordination with other organizations, conducted a needs assessment for the Roundup area in preparation of a Montana Community Foundation grant. The City also began a municipal facility study with the help of a Montana Coal Board grant. In the fall of 1994, another series of community meetings was held to discuss the results of the city facility study and similar facility studies prepared by the school district and the local hospital. During 1995, the RCAD hosted public meetings on community needs in conjunction with its Overall Economic Development Plan preparation. In 1996, with the support of a grant from the Montana Community Foundation, Roundup conducted a three session Financial Forum to discuss the needs that had been identified for the city and county, the school district, and the community hospital. The Forums were facilitated by a local rancher. The City also contracted with an engineering firm to prepare a capital improvements plan.

Committees were formed to focus on topics including Business, Education, Art & Culture, Human Services, Government, Youth, and Agriculture & Land. Citizens from all economic sectors, age groups, and interests participated in the process, including local government officials, seniors and youth, business people, and educators. The total effort represented several thousands of hours of citizen involvement in identifying overall community needs. In 1996, Roundup applied successfully to the State CDBG Program and the Treasure State Endowment Program for grants to improve the city's wastewater treatment system.



Billings

The largest city in Montana successfully used a small group process (sometimes referred to a "nominal group process") to involve the general public in developing a capital improvements plan for Billings. . An article from the *Billings Gazette* describing the process they used is included in Exhibit L and is reprinted with permission of the *Billings Gazette*. If our largest city can accomplish real citizen participation in the process of prioritizing needed public facility improvements, any Montana can use this tool to involve their citizens in a community planning process. See also Exhibit A, page A-6 for more information on the "nominal group process."

Conclusion

The approach each community uses for involving the public in its need assessment process or planning program can and should be tailored to the local situation and is only limited by the creativity of the participants. The techniques described in the following Exhibits offer a "smorgasbord" of options that communities can adapt to fit their community.